

Message

From: Maurin, Lawrence [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2B1FC0F9289F42AAA8A261A76EC411F7-MAURIN, LAW]
Sent: 9/20/2016 7:12:21 PM
To: Kevin Moore [kevin.moore@energytransformationpartners.com]
CC: John Johnston [john.johnston@energytransformationpartners.com]; Lisa Muzekari P.E. [muzekari.l@thomasandhutton.com]; Wolfram, Michael [Wolfram.Michael@epa.gov]; Chen, Eugene [Chen.Eugene@epa.gov]; Fa'amao Asalele [faamao.asalele@epa.as.gov]; William Sili [william.sili@epa.as.gov]
Subject: RE: Follow-up items for ICRC Project permitting
Attachments: adi-nsp-1000019_Conversion of Post Sorted Municipal Solid Waste Feedstock.pdf

Hi Kevin and John,

I wanted to let you know that I spoke with our air enforcement section about your request for exemption from NSPS Subparts AAAA and EEEE as a Small Power Production Facility. They suggested that you submit a formal applicability determination request to their office. I would recommend that you include the contents of your memo dated August 22, 2016 in a request addressed to:

Manager, Air & TRI Section (ENF-2-1)
Enforcement Division
U.S. EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105
Aeo_r9@epa.gov

I would try to submit this request to them as soon as possible because they can take several months. I have also attached a copy of the letter EPA sent to Fulcrum BioEnergy in 2010 with concurrence of their analysis that NSPS Subpart AAAA would not apply to their syngas generation units or air pollution control flare.

Please let me know if you have any questions.

Larry

Larry Maurin
Air Permits Office (AIR-3)
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105
(415) 972-3943
Maurin.Lawrence@epa.gov

From: Kevin Moore [mailto:kevin.moore@energytransformationpartners.com]
Sent: Monday, September 12, 2016 3:55 PM
To: Maurin, Lawrence
Cc: John Johnston ; Lisa Muzekari P.E. ; Wolfram, Michael ; Chen, Eugene ; Fa'amao Asalele ; William Sili
Subject: Re: Follow-up items for ICRC Project permitting

Larry,

We really appreciate you lending your time and attention to us last Thursday. We feel like it was an extremely productive meeting and are looking forward to providing you with all of the information you need for your review.

In terms of your specific requests, I am working with Lisa to get the emissions calculations shored up & in her firm's format. I will send these your way, in spreadsheet form, as soon as that is completed. In addition, we will be sure to include the suggested calculations for the emergency equipment, the IC engine spec sheet, and our discussion of the flare topic. My guess is that all of this will be available this week.

If you need anything at all from us in the meantime, please call or email. We're very excited about moving this process forward.

Thank you,

Kevin

Kevin M. Moore

Chief Operations Officer



Energy Transformation Partners, LLC
361 N Shelmore Blvd.
Mt. Pleasant, SC 29464
Mobile: 843.513.7560
Email: kevin.moore@energytransformationpartners.com

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On Sep 12, 2016, at 8:49 AM, Maurin, Lawrence <Maurin.Lawrence@epa.gov> wrote:

Hi John,

I hope your travels to American Samoa are going well. I wanted to follow up on a few items we were hoping to get from you to assist with our review of the pre-application materials for the ICRC Project.

1. Emission calculation spreadsheets – If you wouldn't mind sharing these excel files with us, they would be helpful for verifying the PTE calculations for the project.
2. Inclusion of the 300 kW emergency engine and 300kW fire water pump potential emissions. We recommend that you use both 500 and 1,000 hours of operation per year, as a worse-case scenario, to estimate the potential to emit for these two units. See this link for EPA's policy on calculating PTE for emergency generators:
<https://www.epa.gov/sites/production/files/2015-08/documents/emgen.pdf>

3. If possible, please provide copies of the manufacturer's emissions specifications for each IC engine.
4. Further discussion of the emergency flare. Specifically, we would like to see more discussion of why a flare with a heat input capacity of 842 mmBTU/hr was selected for the project. Additionally, would ICRC be requesting a permit limit on the hours of operation of the flare to 100 hours/year or are there other inherent limits in the process that would limit the potential to emit of the emergency flare?

Let me know if you have any questions. Feel free to give me a call if you would like to discuss any of these requests over the phone.

Thank you,

Larry

Larry Maurin
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San Francisco, CA 94105
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Maurin.Lawrence@epa.gov